

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	§	Chapter 11 Case
	§	
Old LC, Inc., <i>et al.</i> <sup>1</sup>	§	Case No. 19-11791 (BLS)
	§	
Debtors.	§	Jointly Administered

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Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., <i>et al.</i> ;	§	
	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Adv. No. 20-51002 (BLS)
	§	
Upfront V, LP, Breakwater Credit Opportunities Fund, L.P.; Upfront GP V, LLC; Mark Suster; Dana Kibler; Gregory Bettinelli; Saif Mansour; Aamir Amdani; Eric Beckman; Darrick Geant; and Joseph Kaczorowski	§	
	§	
	§	
<i>Defendants.</i>	§	

**PLAINTIFF’S AMENDED NOTICE TO TAKE ORAL DEPOSITION  
OF DEFENDANT MARK SUSTER**

TO: Mark Suster  
c/o Colin R. Robinson  
PACHULSKI STANG ZIEHL & JONES LLP  
919 North Market Street, 17th Floor  
P.O. Box. 8705  
Wilmington, Delaware 19899-8705

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rule of Civil Procedure 45(a)(4), Plaintiff Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., *et al.* (the “Plaintiff”) hereby notifies all parties to this action and their counsel of record of Plaintiff’s intention to take the oral

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<sup>1</sup> The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14<sup>th</sup> Floor, Atlanta, Georgia 30309.

deposition of Mark Suster. This deposition will take place by Zoom video conference on **Friday, October 15, 2021 at 9:30 a.m. pacific**, and continue thereafter from hour to hour and day to day until completed. This deposition will be conducted pursuant to, and in accordance with, the Federal Rules of Civil Procedure before a certified court reporter. This deposition will be recorded stenographically and will be videotaped.

Dated: September 8, 2021  
Wilmington, Delaware

Respectfully submitted,

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman  
Jeffrey R. Waxman (DE Bar No. 4159)  
Eric J. Monzo (DE Bar No. 5214)  
Brya M. Keilson (DE Bar No. 4643)  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: jwaxman@morrisjames.com  
E-mail: emonzo@morrisjames.com  
E-mail: bkeilson@morrisjames.com

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Joel B. Bailey, Esquire  
Joshua L. Hedrick, Esquire  
**HEDRICK KRING, PLLC**  
1700 Pacific Avenue, Suite 4650  
Dallas, Texas 75201  
Telephone: (214) 880-9625  
Facsimile: (214) 481-1844  
E-mail: Josh@HedrickKring.com  
E-mail: Joel@HedrickKring.com

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Samuel M. Stricklin, Esquire  
**STRICKLIN LAW FIRM, P.C.**  
Palisade Central II  
2435 North Central Expressway  
Suite 1200  
Richardson, Texas 75080  
Telephone 972-2388687  
E-mail: Sam.stricklin@stricklaw.pro

***Counsel for Plaintiff***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served pursuant to the Federal Rules of Bankruptcy Procedure on this 8th day of September, 2021.

/s/ Joel B. Bailey  
Joel B. Bailey